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ATTORNEYS FOR DEFENDANTS MINEONE  
WYOMING DATA CENTER, LLC, MINEONE PARTNERS LLC,  
AND TERRA CRYPTO INC.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

)  
BCB CHEYENNE LLC d/b/a BISON )  
BLOCKCHAIN, a Wyoming limited liability )  
company, )  
Plaintiff, ) Civil Action No. 23CV-79-ABJ  
)  
v. )  
MINEONE WYOMING DATA CENTER )  
LLC, a Delaware limited liability company; )  
MINEONE PARTNERS LLC, a Delaware )  
limited liability company; TERRA CRYPTO )  
INC., a Delaware corporation; BIT ORIGIN, )  
LTD, a Cayman Island Company; )  
SONICHASH LLC, a Delaware limited )  
liability company; BITMAIN )  
TECHNOLOGIES HOLDING COMPANY, a )  
Cayman Island Company; BITMAIN )  
TECHNOLOGIES GEORGIA LIMITED, a )  
Georgia corporation; and JOHN DOES 1-20, )  
related persons and companies who control or )  
direct some or all of the named Defendants. )  
Defendants. )

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**DEFENDANTS MINEONE WYOMING DATA CENTER LLC, MINEONE PARTNERS LLC, AND TERRA CRYPTO INC.’S REQUEST FOR EXTENSION OF TIME TO DESIGNATE EXPERT WITNESSES**

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COME NOW Defendants MineOne Wyoming Data Center LLC, MineOne Partners LLC, and Terra Crypto Inc. (the “MineOne Defendants”) by and through counsel, HATHAWAY & KUNZ, LLP, and LOEB & LOEB LLC, and hereby request an extension of thirty (30) additional days to designate their expert witnesses.

- 1) The initial deadline for the MineOne Defendants to disclose expert witnesses was April 15, 2024. ECF No. 46.
- 2) At the Scheduling Conference on April 25, 2024, this Court extended the MineOne Defendants’ expert designation deadline to July 15, 2024. ECF No. 163.
- 3) Since that time, the MineOne Defendants have filed a Motion to Dismiss for lack of subject matter jurisdiction that is still pending (ECF No. 178). Plaintiff has filed an Emergency Motion (ECF No. 182) that has been amended and supplemented multiple times (ECF Nos. 192 & 204). Further, the parties have been engaged in various discovery disputes as well. The MineOne Defendants have sent a discovery deficiency letter to Plaintiff. Plaintiff has yet to produce various documents that may impact the expert designation and report.
- 4) The MineOne Defendants have conferred with counsel for the Plaintiff and other Defendants. Plaintiff’s counsel objects to this Motion. Counsel for Defendant Bitmain Technologies Georgia Limited joins in the extension request. Counsel for Defendants Bit Origin and SonicHash also does not object.

DEFENDANTS MINEONE WYOMING DATA CENTER LLC, MINEONE PARTNERS LLC, AND TERRA CRYPTO INC.’S REQUEST FOR EXTENSION OF TIME TO DESIGNATE EXPERT WITNESSES

- 5) Defendants seek this extension in light of the other pressing matters involved in this case. The MineOne Defendants have been devoting a substantial amount of time to Plaintiff's Emergency Motion, discovery disputes, and the pending Motion to Dismiss. As such, the MineOne Defendants need additional time to coordinate with expert witnesses.
- 6) For all the reasons discussed above, Defendants request additional time to designate their experts. Further, an extension will not prejudice Plaintiffs in any way because the trial date is set for January 27, 2025, and moving the expert deadline will not affect any other dates.

WHEREFORE, the MineOne Defendants request this Court enter an order granting an extension of up to and including August 14, 2024 in which to designate their expert witnesses.

DATED this 24<sup>th</sup> day of June, 2024.

DEFENDANTS MINEONE WYOMING DATA CENTER, LLC, MINEONE PARTNERS LLC, AND TERRA CRYPTO INC.

By: /s/ Kari Hartman  
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WYOMING DATA CENTER, LLC, MINEONE  
PARTNERS LLC, AND TERRA CRYPTO INC.

**CERTIFICATE OF SERVICE**

This is to certify that on the 24<sup>th</sup> day of June, 2024, a true and correct copy of the foregoing was served upon counsel as follows:

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